

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NELLA MANKO,

Plaintiff,

CIVIL ACTION  
No. 21-CV-1725

-against-

LENOX HILL HOSPITAL; DANA A. MANNOR, M.D.;  
NEW YORK STATE UNIFIED COURT SYSTEM;  
NEW YORK STATE COURT OF APPEALS;  
DECORATO COHEN SHEEHAN & FEDERICO LLP;  
GARSON DECORATO & COHEN, LLP; DECORATO & COHEN  
LLP; GARSON, GERSPACH, DECORATO & COHEN, LLP;  
DECLARATION

LENOX HILL ANESTHESIOLOGY PLLC; "ANESTHESIOLOGIST";  
L.H. RADIOLOGISTS, P.C.; MATTHEW B. LUBIN, M.D.; ALAN  
TIKOTSKY, M.D.; ELTON STRAUSS, M.D.; SUSAN LEVIT, M.D.;  
THE MOUNT SINAI HOSPITAL; THE MOUNT SINAI MEDICAL  
CENTER, INC.; BENJAMIN A. NACHAMIE, M.D.;  
HERBERT S. SHERRY, M.D.; IRINA AVRUCHEVSKAYA, M.D.;  
JOSHUA R. COHEN, ESQ.; LINDA J. DECORATO, ESQ.;  
AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP;  
KAUFMAN BORGEEST & RYAN LLP; C. CARDILLO, P.C.;  
BERNARD H. BROOME, ESQ.; CARDILLO & KEYSER, P.C.;  
LAW OFFICE OF BERNARD H. BROOME, PLLC;  
NEW YORK CITY TRANSIT AUTHORITY; MEDREVIEW, INC.;  
PROFESSIONAL EVALUATION GROUP, INC.;  
DAVID BLOOM, ESQ.; LAW OFFICES OF DAVID A. GABAY;  
DAVID A. GABAY, ESQ.; GABAY LAW GROUP P.C.; INSOURCE  
STRATEGIES, INC.; LAW OFFICES OF DAVID A. GABAY, P.C.;  
GORDON & SILBER, P.C.; RAWLINGS COMPANY, LLC;  
ANDREW B. KAUFMAN, ESQ.; SHOREFRONT APARTMENTS,  
LLC; SHOREFRONT APARTMENTS CO; "LAW OFFICE OF  
MARK S. FRIEDLANDER"; APPELLATE DIVISION OF THE N.Y.S.  
SUPREME COURT (SECOND DEPARTMENT); APPELLATE  
DIVISION OF THE N.Y.S. SUPREME COURT (FIRST  
DEPARTMENT); N.Y.S. SUPREME COURT (KINGS COUNTY);  
N.Y.S. SUPREME COURT (NEW YORK COUNTY); DHCR;  
CITY OF NEW YORK; THE STATE OF NEW YORK,

Defendants.

IN OPPOSITION  
OF ORDER  
TO SHOW CAUSE  
FOR DISMISSAL

-----X  
I, NELLA MANKO, declare under the penalties of perjury that the following facts are true and correct:

1. On January 31, 2023, United States District Court Southern District of New York mailed an Order To Show Cause, dated January 30, 2023 (Docket 21-cv-1725) to Pro Se Plaintiff Nella Manko ordering to show cause until March 01, 2023.

2. This Declaration is submitted in **OPPOSITION** to this Court's Order to Show Cause dated January 30, 2023, and request to extend time to Answer this Court's Order to Show Cause dated January 30, 2023.

3. The facts upon which this instant Plaintiff's Request is based are set forth in the **Documentary Evidence** annexed hereto as true copies of the following Exhibits to this Request. Plaintiff, Pro Se, wants to make these Exhibits a part of this instant Plaintiff's Request and these Exhibits are listed as follows:

**EXHIBIT "1A1"** – Plaintiff-Appellant's Court of Appeals Motion (**Mo. No. 2021-332**), which was denied by the Court of Appeals Order entered on **June 03, 2021**, the motion requested to grant leave to appeal to the Court of Appeals from the following Appellate Division (2d Dept.) Orders:

**(1)** Appellate Division Decision & Order on Motion, dated **March 18, 2020** (Appellate Division Docket No.: **2012-06650**, Supreme Court, Kings County, Index No.: **30972/2004**), on an appeal from an order of Justice Gloria M. Dabiri, dated **May 18, 2012**, and Appellate Division Decision & Order on Motion, dated **April 23, 2020** (Appellate Division Docket No.: **2012-06650**, Supreme Court, Kings County, Index No.: **30972/2004**), which amended Appellate Division Decision & Order on Motion, dated **March 18, 2020**; and

**(2)** Appellate Division Decision & Order on Motion, dated **April 23, 2020** (Appellate Division Docket No.: **2015-06592**, Supreme Court, Kings County, Index No.: **30972/2004**), on an appeal from an order of Justice Gloria M. Dabiri, dated **May 07, 2015**;

**EXHIBIT "1B1"** – Collectively annexed hereto the following: NOTICE OF MOTION, dated January 26, 2023 (Docket 21-cv-1725), DECLARATION IN SUPPORT OF MOTION, dated January 26, 2023 (Docket 21-cv-1725), and EXHIBITS;

**WHEREFORE**, Plaintiff, Pro Se, respectfully requests to extend time to answer this Court's Order to Show Cause dated January 30, 2023.

**I, Nella Manko, hereby declare and affirm, under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge and recollection.**

Dated: March 01, 2023  
Brooklyn, New York

*Nella Manko*  
NELLA MANKO, Plaintiff-Appellant, Pro Se,  
1735 East 13th Street, Apt. 3K, Brooklyn, NY 11229  
Tel. No.: (718) 375-9067